

MILES EHRLICH (Bar No. 237954)
miles@ramsey-ehrlich.com
ISMAIL RAMSEY (Bar No. 189820)
izzy@ramsey-ehrlich.com
RAMSEY & EHRLICH LLP
803 Hearst Avenue
Berkeley, CA 94710
(510) 548-3600 (Tel)
(510) 291-3060 (Fax)

Attorneys for Defendant Hisham Mushasha

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CASE No.: CR-07-00734-MMC

UNITED STATES OF AMERICA ,) **STIPULATION AND [PROPOSED]**
PLAINTIFF,) **ORDER TO MODIFY PROBATION**
v.) **CONDITIONS**
HISHAM MUSHASHA,) AND ORDER THEREON
DEFENDANT.)

The defendant Hisham Mushasha and the government stipulate that this Court should enter an order modifying the conditions of Mr. Mushasha's probation to allow for domestic and international travel, with prior notice to, and approval from, his supervising probation officer. Currently, Mr. Mushasha's travel is restricted to the Northern District of California.

On February 23, 2009, this Court sentenced Mr. Mushasha to 5 years probation. As a condition of probation, he was required to reside at the halfway house for one year, which he did without incident. His travel was also restricted to the Northern District of California, which has continued since his release from the halfway house.

Mr. Mushasha serves at the Chief Financial Officer of BCCI Construction, a major construction company and commercial general contractor. As part of his job, the company requests that he travel from time-to-time domestically, outside of the Northern District of California. Mr. Mushasha, who also has multiple citizenships, also has family members living outside of the United States. Some of his children live in England. His father is also buried outside the United States. Mr. Mushasha would like to travel to see his children and other family members and to his father's grave site.

Probation Officer Daniel Zurita is aware of this request and does not object.

Dated:

Respectfully Submitted,

RAMSEY & EHRLICH LLP

//s//

ISMAIL RAMSEY
ATTORNEY FOR HISHAM
MUSHASHA

JOSEPH P. RUSSONIELLO
US ATTORNEY

//s//

TRACIE BROWN
ASSISTANT US ATTORNEY

GOOD CAUSE HAVING BEEN SHOWN, IT IS SO ORDERED. This court orders that defendant Hisham Mushasha's probation conditions be modified to permit him to travel domestically outside the Northern District of California and internationally, with prior notice to, and approval from, his supervising probation officer.

Dated: April 27, 2010

Maxine M. Chesney
HON MAXINE M. CHESNEY
U.S. DISTRICT JUDGE